

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS – FORT WORTH DIVISION**

**LABOR SAVING SYSTEMS LTD.**

**d/b/a Magnepull,**

*Plaintiff,*

**v.**

**HARBOR FREIGHT TOOLS USA, INC.,**

**DOES 1–79,**

*Defendants.*

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**Case No. 4:21-cv-01389-O**

**PLAINTIFF’S NOTICE OF DISMISSAL OF  
DEFENDANT HARBOR FREIGHT TOOLS USA, INC.**

Plaintiff Labor Saving Systems Ltd. d/b/a as Magnepull (“Plaintiff”), pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, hereby dismisses all causes of action in his Complaint against Defendant Harbor Freight Tools USA, Inc. (“HFT”) without prejudice.

HFT has filed neither an answer to the Complaint nor a motion for summary judgment as to Plaintiff’s claims. Therefore, dismissal under Rule 41(a)(1) is appropriate.

Respectfully submitted,

/s/Warren V. Norred, P.E.

Warren V. Norred, P.E.

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE** - I certify that a copy of the attached document was served informally to Harbor Freight by email on January 21, 2022, to its counsel, Dave Grable <davegrable@quinnemanuel.com> and Eric Huang <erichuang@quinnemanuel.com>.

/s/ Warren V. Norred

Warren V. Norred

**CERTIFICATE OF CONFERENCE** No defendant has appeared yet in this case, and therefore, pursuant to Local Rule 7.1b, undersigned counsel states that he is unable to meet and confer with the defendants and unable to state whether this motion is opposed.

/s/ Warren V. Norred

Warren V. Norred